

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC,

Plaintiff,

v.

ISLAND PROJECT AND OPERATING SERVICES,  
LLC; VITOL US HOLDING II CO.; VITOL VIRGIN  
ISLANDS CORP.; ANDREW CANNING; and OPTIS  
EUROPE, LTD.,

Defendants.

CIVIL NO. 1:21-CV-00312

**DECLARATION OF MICHAEL CRAIG KELSO, ESQ. IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

I, Michael Craig Kelso, Esq., declare as follows:

1. I am a partner with the law firm of Susman Godfrey LLP.
2. I am a member in good standing of the State Bar of Texas, which licensed me to practice law in all courts in Texas on November 6, 2014. I have not been admitted as a member to the bar of any other state.
3. I am not, nor have I been, the subject of any disciplinary proceedings brought by any court or other judicial or administrative body.
4. I will be working directly with Carl A. Beckstedt III, Esq., a member of the Bar of this Court, to act as counsel for Defendants Vitol Virgin Islands Corp. and Vitol US Holding II Co. in the above-captioned matter.
5. I agree to abide by the Local Civil Rules of the United States District Court for the District of the Virgin Islands, Division of St. Croix and any Orders that may be issued by the Court concerning this instant litigation.

6. Statement on Item A(5) of the Pro Hac Vice Application. In October 2007, I was cited for Minor In Possession of Alcohol in Los Angeles, California. I pleaded no contest and paid the fine assessed. The citation was issued by the University of California Police Department, Los Angeles, 601 Westwood Plaza, Los Angeles, California 90095, the citation was Citation No. P54358, and the court was the Superior Court of California, County of Los Angeles, 1633 Purdue Avenue, Los Angeles, California 90034. I disclosed this citation to the State Bar of Texas. I regret this serious mistake and have had no legal problems since aside from minor traffic violations.

7. I am a member of the following United States Courts:

U.S. COURT	DATE OF ADMISSION/BAR NO.
U.S. District Court for the Southern District of Texas	4/17/2019 / Bar No. 3394505
U.S. District Court for the Northern District of Texas	7/25/2019 / Bar No. N/A
U.S. District Court for the Western District of Texas	8/23/2019 / Bar No. N/A
U.S. District Court for the Eastern District of Texas	7/25/2019 / Bar No. N/A
U.S. Court of Appeals for the First Circuit	4/21/16 / Bar No. 1174685
U.S. Court of Appeals for the Second Circuit	3/5/2018 / Bar No. N/A
U.S. Court of Appeals for the Fifth Circuit	8/27/2015 / Bar No. N/A
U.S. Court of Appeals for the Eleventh Circuit	4/15/2019 / Bar No. N/A

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 23, 2023



Michael Craig Kelso